

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE
FOR PERSONAL INJURY AND DEATH CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Ronald L. Motley (1944-2013)
Jodi Westbrook Flowers / Donald A. Migliori, *Co-Chairs*
MOTLEY RICE LLC

Robert T. Haeefe, *Co-Liaison Counsel*
MOTLEY RICE LLC

VIA Electronic Mail

July 10, 2025

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committee for Personal Injury and Death Claims ("PEC") writes in response to the Court's June 25, 2025 Order seeking input from the PEC on whether it has any comments, suggestions, or questions regarding the proposed revised tables that the Court provided in connection with default judgment motions. *See* ECF No. 11036. The PEC conferred regarding the Court's proposal and agreed that these proposed default judgment exhibit templates will increase the Court's efficiency by allowing for the automatic calculation of pre-judgment interest owed to each Plaintiff.¹

Should the Court have any additional concerns, the PEC remains available as always to address any questions or concerns that the Court may have.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe

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*For the Plaintiffs' Exec. Committee for Personal Injury and Death
Claims*

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF

¹ The PEC also consulted with the Plaintiffs' Executive Committee for Commercial Claims, which advised that it takes no position with respect to the proposed form.